surprising, for it would contravene this Court's prohibition against "blanket rules" allowing no-knock entries in drug investigations. *See Richards*, 520 U.S. at 394; Pet. App. 36a.

Second, whatever presumptions regarding violence may pertain when a person is believed to possess a sawed-off shotgun, courts have held that exigent circumstances do not exist when officers lack a particularized reason to believe that a potentially violent person "would be in the residence at the time of the search." *United States v. Smith*, 386 F.3d 753, 760 (6th Cir. 2004); *see also State v. Wright*, 697 N.E.2d 693, 697-98 (Ill. 1998) (no exigent circumstances present when officers had observed on premises, one week before, several gang members "under investigation for firearm violence" and one who "had been convicted of aggravated discharge of firearm" because there was no evidence that any would be in house at the time of search or that homeowner himself had violent propensity). These holdings conflict with the Eighth Circuit's decision here. The police knew that Petitioner's son was twenty-six years old, and Respondents never have suggested the police had any particularized reason to believe he lived in, or would be inside, his parents' house when the officers conducted their search. *See* Pet. for Cert. at 20; Pet App. 68a.

Indeed, there are serious grounds to question whether the police even reasonably believed that Petitioner's son had been arrested for possessing a sawed-off shotgun. The officers' only source for that information – which turned out to be false – was the anonymous tip. While officers may reasonably rely on anonymous tipsters for many types of information, it is peculiar that the police would rely on a tipster regarding information that is uniquely within the police's own control: whether someone has been arrested or being investigated for committing a crime. The police's failure here to check the accuracy of the tip in that respect highlights the need for this Court to grant review and to confirm that the investigative prerequisites for justifying no-knock entries are meaningful.

CONCLUSION

For the foregoing reasons, the petition for writ of certiorari should be granted.

Respectfully submitted,

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